

REMARKS

This amendment is submitted in response to the Office Action dated July 19, 2005. Claims 1-3, 5-9, 11-15, and 17-8 have been amended herein. Claims 4, 10, and 16 have been cancelled and claims 19-20 have been added. Claims 1-3, 5-9, 11-15, 17-20 are currently pending. Applicants appreciate the Examiner's willingness to discuss the presently pending issues with the undersigned Applicants' representative on November 7, 2005.

CLAIMS REJECTIONS UNDER 35 U.S.C. § 112

At paragraph 4 of the Office Action, claims 6, 12, and 16 are rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Applicants' proposed invention is described most specifically in the specification on page 104, line 3 through page 109, line 4, with reference to **FIGS. 20A-20E**. Regarding the "lower level directory" and "higher level directory" features recited in claims 6, 12, and 16, Applicants contend that the "first tier of subdirectories **2031**" and "second tier of subdirectories **2032**" described and depicted on page 106, line 28 through page 107, line 11, with reference to **FIG. 20D**, are amply descriptive of an exemplary "higher level directory" and "lower level directory," respectively, as used in the claims. Namely, directories contained within the first tier of subdirectories **2031** are representative of said "higher level directory" and directories contained within the second tier of subdirectories **2032** are representative of said "lower level directory." Applicants believe the foregoing specification and figures provides sufficiently substantive description of the "lower level directory" and "higher level directory" features recited in claims 6, 12, and 16 and that the current rejections under 35 U.S.C. § 112, first paragraph should be withdrawn.

CLAIM REJECTIONS UNDER 35 U.S.C. § 103

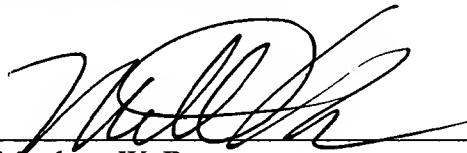
Claims 1-18 have been rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,470,478, issued to Bargh et al. (hereinafter *Bargh*) in view of U.S. Patent No. 6,839,751, issued to Dietz et al. (hereinafter *Dietz*). Applicants assert that *Bargh* is disqualified under 35 U.S.C. 103(c) as 102(e) prior art in a rejection under 35 U.S.C. 103(a). Specifically, Applicants assert that the present application and the *Bargh* reference were, at the time the invention recited in the pending claims was made, owned by, or subject to an obligation of assignment to, the

same person, namely International Business Machines Corporation, as evidenced by the Assignee designation on the front page of *Bargh* and the Assignment set forth at reel 011427, frame 0636 *et. seq.* of the USPTO assignment records.

The foregoing disqualification of the *Bargh* reference notwithstanding, the claims have been amended herein to more clearly characterize Applicants' proposed invention. Ample support for the claims and present amendments are provided in Applicants' specification on page page 104, line 3 through page 109, line 4, with reference to **FIGS. 20A-20E** and no new matter has been added.

Applicants respectfully request issuance of a Notice of Allowance for all claims now pending and invite the Examiner to contact the undersigned attorney of record at 512.343.6116 if such would further or expedite the prosecution of the present Application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. Baca', is written over a horizontal line.

Matthew W. Baca

Reg. No. 42,277

Dillon & Yudell LLP

8911 North Capital of Texas Highway
Suite 2110

Austin, Texas 78759

512.343.6116

ATTORNEY FOR APPLICANT(S)